Department of Agriculture, Environment and Rural Affairs

FINAL REPORT — JUNE 2026

Nutrients Action Programme

(NAP) 2027–2030

Stakeholder Task & Finish Group

Report to the Minister for Agriculture, Environment and Rural Affairs

SUBMITTED TO

Andrew Muir MLA

Minister for Agriculture, Environment and Rural Affairs

SUBMITTED BY

Karen Brosnan

Independent Chair, NAP Stakeholder Task & Finish Group

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1. Purpose of this Report

This report is submitted in accordance with the Terms of Reference agreed by the Nutrients Action Programme (NAP) Stakeholder Task & Finish Group and in fulfilment of my role as Independent Chair. It sets out the work undertaken by the Group following its establishment by the Minister in response to the stakeholder consultation on the proposed Nutrients Action Programme (NAP) 2027-2030. It describes the structure and operation of the process, the principal themes and concerns examined by the Group, the role of supporting scientific, technical and economic workstreams, and the broad outcomes and areas of progress emerging from the work undertaken. The report is intentionally focused on process, progression and development rather than attribution of stakeholder positions. Its purpose is to provide assurance regarding:

- the integrity and robustness of the process undertaken;
- the manner in which consultation responses and alternative proposals were examined;
- the role of scientific, technical and economic evidence in informing discussions;
- the extent to which proposals were refined and tested against practical

implementation considerations; and

- the importance attached throughout the process to continued collaboration, trust and transparent engagement.
- the need for ongoing governance, adaptive management and continued review as implementation progresses.

Sustained cross-sector engagement enabled substantial refinement of proposals, and consensus was ultimately reached on every measure. This contributed to the development of a more integrated, targeted and implementation-focused approach to nutrient management and water quality improvement.

The Task & Finish Group has now completed its work and reached consensus on a coherent package of recommendations for Ministerial consideration. Through thirteen meetings and extensive supporting technical, scientific and economic workstreams, the Group substantially refined the original proposals and improved understanding across sectors regarding nutrient pressures, implementation realities, scientific evidence and operational challenges. The recommendations presented reflect the collective outcome of that process and provide a credible basis for improving water quality while recognising the practical realities facing the agri-food sector.

The report does not seek to present final policy decisions. Responsibility for determining the content of the revised NAP and the basis for further consultation remains with the Minister and the Department. The report should be read as setting out the process, evidence and agreed recommendations informing those decisions.

2. Background and Context

The Nutrients Action Programme (NAP) is the key part of Northern Ireland's statutory framework for reducing and preventing water pollution from agricultural sources. The review of

the proposed NAP 2027-2030 took place against a backdrop of increasing concern regarding water quality deterioration in Northern Ireland, including continuing concern regarding nutrient enrichment and eutrophication in rivers, lakes and loughs, particularly Lough Neagh. The Group recognised from the outset that agriculture is not the only source of water pollution. Pressures also arise from wastewater infrastructure, septic tanks, urban runoff, industry and wider land-use activities. However, the specific remit of this process was to examine agricultural nutrient management measures within the revised NAP and to support development of proposals that are effective, proportionate and deliverable at farm level. The review process also took place within a wider legal and policy framework including:

- Water Framework Directive obligations;
- River Basin Management Planning requirements;
- Nitrates Directive obligations;
- Habitats Regulations requirements;
- and ammonia reduction commitments under the National Emission Ceilings Regulations.

A public consultation on the proposed revised NAP, launched in May 2025, generated significant engagement from farmers, environmental organisations, industry representatives and members of the public. A number of stakeholders also expressed concern that there had been insufficient engagement before the May 2025 consultation, with no opportunity to test the practicality and deliverability of the proposals before they were published. Consultation responses reflected broad recognition of the need to improve water quality and reduce nutrient pressures. At the same time, substantial concerns were raised regarding:

- practicality and deliverability;
- pace and sequencing of implementation;
- cumulative impacts on farm businesses;
- proportionality;
- infrastructure and planning constraints;
- and the interaction between environmental and legal obligations, ecosystem service considerations, farm viability and wider social and economic objectives.

Alternative approaches proposed through the consultation process included:

- greater use of targeted and catchment-based approaches;
- phased implementation;
- stronger emphasis on nutrient efficiency;
- advisory and behavioural approaches;
- and increased recognition of operational realities at farm level.

The Minister therefore requested the establishment of a time-bound, independently chaired Stakeholder Task & Finish Group to provide a structured forum through which consultation responses, scientific evidence, operational considerations and alternative proposals could be examined in detail.

3. Establishment and Role of the Group

The Nutrients Action Programme Stakeholder Task & Finish Group was formally established in October 2025. The Group brought together representatives from:

- farming organisations;

- agri-food and processing sectors;
- environmental organisations;
- and DAERA.

Its membership reflected the Minister's intention that revised proposals should be informed by a broad range of perspectives and tested through structured cross- sector engagement. The agreed Terms of Reference provided that the Group would:

- review consultation responses and alternative proposals;
- examine scientific and technical evidence;
- consider practical implementation issues;
- identify areas requiring refinement or further work;
- and support development of revised proposals capable of meeting environmental and legal obligations while remaining workable at farm level.

The Group's work was supported by:

- a **Science Sub-Group** chaired independently by Dr Pat Dillon, Teagasc;
- a **Technical Working Group** chaired independently by Professor Elizabeth Magowan, which included DAERA policy and technical officials, ENGOs, Industry and UFU representatives;
- and an **Economic Impact Assessment** Subgroup chaired by Fiona Dickson

The Science Sub-Group examined scientific evidence underpinning proposals, made recommendations and responded to agreed priority questions identified by the Stakeholder Task & Finish Group. The Technical Working Group met frequently, considering operational feasibility; implementation pathways; interactions between measures; and technical drafting considerations. The Economic Impact Assessment Subgroup was established in March to provide a complementary assessment of the economic implications of the revised proposals. Its work is intended to inform Ministerial decision-making by considering likely positive and negative economic impacts on farmers, different farm business types, the wider agri-food sector and, where relevant, the Northern Ireland economy and the impact on the environment of not acting. It will not make policy decisions, but provides evidence-based economic advice to sit alongside the scientific and technical workstreams. The NAP Task and Finish Group was not established to secure unanimity on every issue. Rather, it was intended to provide a disciplined and transparent process through which:

- differing perspectives could be explored constructively;
- assumptions could be tested against evidence;
- implementation challenges could be examined openly;
- and revised proposals could be iteratively refined.

Members of the NAP Stakeholder Task & Finish Group

4. How the Group Worked

The Group commenced its work on 22 October 2025 and undertook an intensive programme of meetings and supporting workstreams between October 2025 and June 2026. The detailed meeting schedule is included at Annex B so that the main body of this report can focus on the substance of the issues considered and the progression of the work.

At an early stage, the Group agreed a Team Charter setting out shared expectations regarding behaviours, participation and ways of working. These included:

- respectful and open dialogue;
- evidence-informed discussion;
- constructive challenge;
- recognition of differing perspectives;
- and careful handling of disagreement in a high-profile and sensitive policy area.

Discussions were conducted on a non-attributable basis in line with agreed ground rules. This enabled participants to test ideas, explore alternatives and examine implementation issues openly without concern that evolving positions would be publicly attributed to individual stakeholders. This non-attributable approach was important in supporting candour, but it also brought challenges. Members were participating as part of a confidential process while also needing, where appropriate, to keep their own organisations and constituencies sufficiently informed and engaged. This required careful handling so that the Group could maintain trust and openness within the room, while also supporting members to bring their wider networks

with them as proposals evolved. The work also took place within demanding constraints. The membership of the Group was deliberately broad, reflecting farming, environmental, agri-food and government perspectives. This diversity strengthened the process, but also meant that complex scientific, technical, legal, operational and economic issues had to be worked through within tight turnarounds and against a high level of external interest. These features reinforced the need for disciplined facilitation, clear papers, careful sequencing of discussions and continued attention to trust. Throughout the process, meetings were structured to support understanding and refinement rather than force premature agreement. As the work progressed, the process became increasingly iterative and implementation-focused. Proposals were revisited and refined in light of scientific advice, technical input, operational feasibility, implementation considerations, and stakeholder feedback. The Group distinguished carefully between scientific evidence, policy judgement, legal obligations and operational practicality. A structured workplan and RAG review process supported progression of discussions, enabling the Group to identify areas of emerging agreement, isolate issues requiring further technical clarification

and sequence discussions so that interdependent measures could be considered coherently. Through the process, the Group arrived at a more developed and integrated set of revised proposals relating to phosphorus management, nutrient stewardship arrangements, including consideration of approaches to replace the existing derogation model, slurry and digestate movement systems, enforcement and inspection approaches, ammonia reduction measures and Low Emission Slurry Spreading Equipment (LESSE). Further technical refinement work was commissioned in relation to protected urea, ammonia reduction modelling and verification requirements for slurry and digestate movement recording systems. The later stages of the process also reflected the increasing emphasis being placed on implementation pathways, practical delivery arrangements and communications planning ahead of a further public consultation process.

5. Key Themes Emerging from the Process

A number of consistent themes emerged through the course of discussions. There was broad recognition across the Group that water quality deterioration in Northern Ireland is serious, that action is required to reduce nutrient losses and that long-term environmental improvement will require sustained action over time. The Group also recognised that the 2027-2030 NAP period should be understood as an important stage in a longer journey, rather than the final destination. Further action is likely to be required beyond this programme period to achieve the environmental outcomes required over the longer term.

The Group also recognised the central role of farming in both the history of nutrient management pressures and in the solution. Past and current agricultural practices have contributed to nutrient loading in some catchments, but farmers and land managers are also essential partners in improving nutrient efficiency, reducing losses, protecting soils and delivering practical change on the ground. The process therefore sought to frame the role of farming not only in terms of compliance, but also in terms of stewardship, innovation and leadership in improving water quality.

At the same time, stakeholders consistently emphasised the importance of maintaining productive and economically sustainable farming systems, ensuring measures are practical and deliverable, avoiding unintended consequences and maintaining confidence within rural communities and agri-food supply chains. Other recurring themes included the importance of adequate resourcing for advice, inspection and implementation support; effective and proportionate enforcement; wider system change that works better for both agriculture and the

environment; and continued improvement in water quality monitoring, including ground-truthed data and evidence capable of supporting confidence in decision-making.

As discussions progressed, there was increasing emphasis on nutrient efficiency, precision nutrient management, improved use of farm-level data, behavioural change, advisory support and targeted interventions focused on highest-risk pathways and catchments. The Group also increasingly recognised that successful implementation would depend not only on the content of revised measures, but also on trust, transparency, communication, practical support mechanisms and realistic transition pathways. There was recognition throughout the process that while agriculture has a significant role in nutrient pressures, long-term water quality improvement requires action across multiple sectors and programmes, including wastewater infrastructure, septic tank management and wider catchment-based interventions.

6. Evolution of Key Measures

One of the most significant outcomes of the process was the substantial refinement of a number of key proposals. As discussions progressed, proposals increasingly evolved from broad or universal approaches toward more targeted, phased and implementation-focused measures.

Phosphorus

Discussions relating to phosphorus management focused heavily on the need to address continuing phosphorus surpluses and long-term accumulation of phosphorus within soils. Initial discussions included phosphorus balance limits, restrictions on chemical phosphorus fertiliser and stronger regulatory controls. Over time, proposals evolved toward more targeted approaches, stronger emphasis on advisory support and behaviour change, Responsible Phosphorus Management approaches, nutrient planning and catchment-focused interventions.

Agreement was reached on a package of phosphorus measures. Measure 4.1.1 maintains a regulatory limit on chemical phosphorus fertiliser use, linked to soil test index, which will now be supported by point-of-sale controls and a Responsible Phosphorus Management campaign. This approach will be reviewed after two years; if monitoring finds it insufficient, a more restrictive regulatory system will be required. Measure 4.1.2 sets a target to reduce the national average phosphorus surplus by 30%, from the 2024 baseline of 8,729 tonnes, over the four years of the NAP. This target was agreed as realistic and achievable, while recognising that delivery is dependent on development of manure processing and export infrastructure.

Updated nutrient excretion values for dairy cows were also agreed, replacing the previous single figure with a milk-yield banding system. Seven bands are proposed, ranging from 77 kg N per cow per year at yields below 5,000 litres to 149 kg N per cow per year at yields above 12,000 litres, with corresponding phosphorus values updated accordingly. Updated poultry nutrient excretion figures were also agreed.

Nitrogen

Agreement was reached on a range of nitrogen measures. The updated dairy cow excretion values described above under phosphorus apply equally to nitrogen accounting across the NAP. Whole-farm chemical nitrogen fertiliser limits for grassland (4.1.6) were agreed on the basis of grass production level rather than livestock farm type alone. Under the agreed approach, allowable nitrogen from chemical fertiliser and non-livestock organic sources is linked to a farm's grass production, with higher limits available only to farms that can demonstrate higher yields.

For protected urea, a previously unresolved issue, agreement was reached on a seasonal approach: unprotected granular urea may only be applied during the window of 1 February to 31 March inclusive, and from 1 April to 15 September all granular urea-containing fertilisers must be protected (treated with a urease inhibitor). This resolved the outstanding question around urea management, providing a workable and proportionate approach to reducing ammonia emissions from nitrogen fertilisers.

Ammonia and LESSE

Agreement was reached on a comprehensive package of ammonia and LESSE measures. The definition of Low Emission Slurry Spreading Equipment was clarified and updated to be technology-neutral: The existing definition of LESSE has been supplemented to include any method that reduces ammonia emissions by 30% or more compared with the inverted splash plate method,. This will allow new technologies to qualify alongside established equipment such as trailing shoe, trailing hose and injection systems.

A tiered mandatory expansion of LESSE was agreed, extending the requirement progressively to more farms based on size in livestock units. Under Tier 1, all farm businesses with more than 100 livestock units must use LESSE by February 2028. Under Tier 2, all farm businesses over 75 livestock units, and pig farms producing more than 10,000 kg of livestock manure nitrogen per year, must comply by February 2029. Under Tier 3, all farm businesses over 50 livestock units must comply by February 2030.

This tiered approach balances environmental ambition with practical considerations including cost, equipment availability and contractor capacity. Protected urea was agreed as part of the ammonia reduction package, with the seasonal restriction described above under nitrogen providing a proportionate means of reducing ammonia emissions from fertilisers. Both the LESSE expansion and the protected urea measure are to be incorporated into the Ammonia Strategy, subject to the consultation which will take place on the NAP proposals.

Nutrient Stewardship Programme

Agreement was reached on replacing the current Derogation with a new Nutrient Stewardship Programme (NSP). The renaming reflects the higher standards of nutrient management required and the environmental benefits delivered. The NSP introduces a two-tier structure. Tier 1 is for farms that already meet all requirements, recognising their high standard of nutrient management; Tier 1 farms apply for up to four years, aligned with the NAP cycle, rather than annually. Tier 2 is for farms that do not yet fully meet the Tier 1 phosphorus balance requirements; these farms must apply annually to allow progress to be monitored, and commit to reducing their phosphorus surplus by at least 10% over four years or to a limit of 10 kg phosphorus per hectare per year.

The minimum grassland requirement is reduced from 80% to 70%, allowing more flexibility for arable cropping with appropriate safeguards near watercourses. All NSP participants must prepare annual nutrient plans and submit annual nutrient accounts which are subject to 100% control. Inspection rates are risk-based: Tier 1 farms are subject to a 1% inspection rate; Tier 2 farms (considered in-conversion) are subject to a 5% rate; farms operating above 170 kg nitrogen per hectare per year outside the NSP are considered high risk and subject to a 10% inspection rate. The uptake and impact of the NSP will be reviewed after two years and again as part of the wider NAP review.

Focused Approach

Agreement was reached on introducing a focused approach to support the NAP in specific high-risk catchments where water quality pressures are greatest. The focused approach is voluntary and relies on advice, education and incentivised action rather than additional regulatory controls. Catchments will be identified using water quality monitoring data, information on protected sites and habitats, evidence of rising nutrient levels and land runoff risk assessments.

Support in focused areas will include non-regulatory advisory farm visits, training on nutrient management and water protection, access to funding for practical measures such as buffer strips, tree and hedge planting and yard improvements, and guidance on managing or exporting excess nutrients. Farmers in focused areas will be invited to participate in themed peer learning groups that meet at key times of the year, often hosted on participating farms, allowing farmers to learn from advisers and each other. Uptake and impact will be reviewed after two years; where monitoring demonstrates that initial measures are not sufficient to achieve the required environmental outcomes, additional or strengthened measures will be implemented.

7. Role of Science and Evidence

Scientific evidence played an important role throughout the process. The Science Sub-Group operated in an advisory capacity, responding to agreed priority questions identified by the Stakeholder Task & Finish Group, while the Technical Working Group carried forward detailed consideration of feasibility, implementation and drafting issues. Scientific and technical discussions included phosphorus surpluses, nutrient pathways, nitrogen excretion values, ammonia inventories, slurry spreading technologies, nutrient efficiency and water quality trends. This scientific and technical work carried the substantial share of detailed examination during the Task & Finish process.

The Economic Impact Assessment Subgroup provided a further supporting strand, focused on assessing the likely economic implications of the revised package, including impacts on farm businesses and the wider agri-food sector, and recognising environmental benefits and the potential economic, social and environmental costs of inaction where these can be quantified or otherwise described qualitatively.

The process enabled scientific evidence to be tested transparently alongside operational realities and implementation considerations. Discussions also highlighted the importance of distinguishing between scientific evidence itself, interpretation of evidence, policy choices arising from evidence and practical considerations relating to implementation. The process reinforced the importance of iterative scientific review and modelling. Additional ammonia reduction modelling was commissioned following discussion of LESSE adoption rates and wider ammonia reduction measures. The process benefited from continued engagement between stakeholders, scientists and officials, enabling technical issues to be explored in greater detail and assumptions to be challenged constructively.

8. Communications, Delivery and Implementation

As the process progressed, the Group increasingly recognised that successful implementation would depend not only on the content of revised measures, but also on stakeholder understanding, trust, transparency and practical delivery support. A dedicated communications workstream was established to support stakeholder engagement, consultation planning, implementation messaging and the development of clear, consistent explanatory material.

The Group agreed that communications teams should work collaboratively to support coherence and consistency ahead of further consultation. There was also recognition that delivery will require ongoing engagement, advisory support, phased implementation, review mechanisms, effective enforcement, transparent reporting and practical support for those expected to implement the measures.

The successful delivery of the updated Nutrients Action Programme (NAP) depends on wider policy, delivery and investment systems working effectively together.

The Group agreed that the proposed measures depend on demonstrable progress on wider ammonia policy.

The Group agreed that the proposed measures depend on demonstrable progress on wider ammonia policy. The Group was clear that such progress was needed, alongside the implementation of the NAP measures, recognising that the NAP's ambition can only be realised where ammonia policy advances in parallel. It was recognised that there are interdependencies between ammonia mitigation and the environmental assessments which are completed as part of the planning process. The Group recommended that the governance arrangements described below include a formal mechanism for assessing ammonia policy progress as part of considerations regarding implementation of the measures.

Improvements in water quality and sustainable nutrient management are also linked to progress on air quality, climate change, land use, advisory support, infrastructure and nutrient-processing technologies. Delivery will require coordinated effort across farmers, the agri-food industry, investors, regulators, advisory bodies and environmental organisations.

The Group also agreed on the value of an ongoing governance mechanism, building on the Technical Working Group, to review implementation experience, system-wide delivery issues and wider enabling actions. This would provide a forum for monitoring progress, identifying practical barriers and ensuring evidence and delivery experience can inform any refinements required during the four years of the updated NAP. It would also provide a sound basis for the next NAP review.

9. High-Level Outcomes and Next Steps

Agreed Outcomes

The Task & Finish Group has now completed its work and reached consensus on a coherent package of recommendations for Ministerial consideration.

Through thirteen meetings, supported by scientific, technical and economic workstreams, the Group substantially refined the original proposals and improved understanding across sectors regarding nutrient pressures, implementation realities, scientific evidence and operational challenges.

The process moved from a position of significant disagreement on many of the original consultation proposals to consensus on a comprehensive package of measures intended to improve water quality while recognising the practical realities facing farmers and the wider agri-food sector.

The recommendations presented reflect the collective outcome of that process and provide a credible basis for improving water quality while supporting a productive and sustainable agri-food sector.

Recommendations for Ministerial Consideration

The process enabled significant refinement and ultimately full agreement across the Group, through careful engagement and compromise across different perspectives. The agreed package of proposals will now be subject to review by the Minister and the Department, taking account of environmental and legal obligations, scientific advice, economic impact, operational practicality and wider public policy considerations. The Group's role was to test, challenge and refine proposals through a structured process, thereby strengthening the basis for final decision-making.

The process arrived at significantly developed revised recommendations for Ministerial consideration. The detail of the recommendations made by the Group is set out in the accompanying Summary of Proposed Measures (Annex C).

The process also resulted in stronger integration between scientific evidence and implementation considerations, greater emphasis on advisory and behavioural approaches, clearer recognition of catchment-based interventions, improved understanding of interactions between measures and a stronger focus on implementation readiness and stakeholder engagement.

The revised proposals will now be subject to review by the Minister and to the required supporting assessments. These are expected to include, as appropriate, Strategic Environmental Assessment, Habitats Regulations Assessment, Regulatory Impact Assessment, equality screening or assessment and rural needs assessment. The proposals and associated assessments will also be subject to consultation. In line with the Group's Terms of Reference, where the Minister or Department decides to amend proposals emerging from the Group's work, the nature of those changes and the reasons for them should be clearly set out to the Task and Finish Group in advance of those changes being made public.

Governance and Implementation Oversight

The Group strongly emphasised the importance of ongoing governance, implementation oversight, review and adaptive management. This was viewed as a critical part of the overall package, not an ancillary issue. There was clear support for the establishment of an ongoing governance structure, involving representation from Task & Finish Group stakeholders, to support continued monitoring of implementation, review effectiveness over time and provide a forum for ongoing engagement as measures are introduced and evaluated. The Group also recognised that this structure should be supported by a clear mechanism through which evidence, implementation experience and review recommendations can inform meaningful adjustments or further action during the NAP period, where required.

The Group considered this governance mechanism particularly important in relation to monitoring progress on wider ammonia policy and reviewing any implications for implementation sequencing during the four years of the updated NAP.

This reflected a shared recognition that improving water quality will require sustained implementation, ongoing learning, continued stakeholder engagement and periodic review as evidence, environmental conditions and operational experience evolve over time. It also reflected an understanding that the revised NAP is part of a longer-term pathway: progress within the 2027-2030 period will be important, but further action may be required beyond that timeframe to achieve and maintain the necessary environmental outcomes.

The Way Forward

Given the intensity and complexity of the process, there would also be value in a short reflective session after the formal Task & Finish phase concludes. This could capture lessons on what worked well, what proved difficult, and how future governance arrangements can best support trust, accountability, delivery and continued stakeholder engagement.

Above all, the process demonstrated the value of structured stakeholder engagement in addressing complex environmental, economic and social challenges. While participants brought different perspectives and interests to the discussions, the Group ultimately reached consensus on a package of recommendations that balances environmental ambition with practical implementation considerations. Maintaining the trust, relationships and collaborative spirit developed through this process will be essential to successful delivery of the updated NAP and to future policy development.

Annex A. Terms of Reference

TERMS OF REFERENCE

DAERA NUTRIENTS ACTION PROGRAMME 2026-2029 STAKEHOLDER TASK AND FINISH GROUP (NAPSTFG)

The aim of the Nutrients Action Programme (NAP) is to improve water quality by reducing and preventing pollution caused or induced by nutrients from agricultural sources. Pollution caused by other sources is recognised and addressing it will be taken forward through other processes and are not within the scope of this Group.

This is the fourth review of the programme which was established in 2007 and is reviewed every four years. The initial consultation on proposed revised and new NAP measures for 2026-2029 completed on 24 July 2025. The DAERA Nutrients Action Programme 2026-2029 Stakeholder Task and Finish Group (NAPSTFG) (the Group) has been established by the Department of Agriculture, Environment and Rural Affairs (DAERA) and will meet under the Chairmanship of an external facilitator.

1. Purpose

The purpose of the Group is to produce a report for the Minister which sets out proposals to improve water quality for inclusion in the NAP 2026-2029 within the legal framework. In doing so, the Group will take into account the proposals already consulted upon, the consultation responses to date, and any other potential alternative solutions or information raised within the Group, that are supported by evidence and will meet the legal obligations to improve water quality. The proposals set out in the Group's report shall be submitted to the DAERA Minister and shall be treated as a material consideration in the formulation of proposals for public consultation on the revised draft NAP 2026-2029. Should the Minister or DAERA propose to supplement the Group's report or introduce additional proposals, the Group shall be given the opportunity to review and comment on such additions in advance of public consultation. The Group's comments shall be given appropriate weight, and any such additions shall be clearly identified as separate from the Group's proposals within the consultation document.

2. Role of the Group

Key role of the Group is to:

a. Work through an external facilitator, to produce a report to review actions to be presented to the Minister for inclusion in the further draft NAP 2026-29 which will be subject to further public consultation. These measures must:

- Be evidence based,
- Be workable and practical, economically viable and achievable at farm level within realistic timeframes,
- set NI on a pathway so that measures must comply with/ enable compliance with all relevant legislative requirements by the end of the NAP period.
- enable the agri-food industry to continue to thrive whilst supporting

environmental sustainability b. Agree the terms of reference for and commission the economic impact on any proposals to go forward for consultation. c. If required, work on a framework to

support the agri-food sector to integrate any changes. d. Agree to the presentation of these proposals to the DAERA Minister for his consideration and final decision.

3. Interaction outside the Group

Where the remit of a specific measure, or topic for discussion, extends beyond the Group's membership, individual stakeholder members may seek external views and provide papers or input on specific topics. If any policy development falls under the remit of another Government Department, the relevant officials will be invited to contribute. DAERA will also engage at official levels with a wider range of stakeholder organisations outside of this arrangement as necessary and in line with the normal course of business.

A subgroup for science and research, will be established to support and inform the work of the Group and that will include AFBI and AgriSearch and other relevant

independent organisations. The terms of reference of the Science sub-group will be signed off by the Group.

However, these processes must not prejudice the completion of the work in line with the stipulated timeframe. There is always potential to form other sub-groups if needed.

4. Areas which are not within the Scope of the Group

The following areas are not within the scope of this Group:

- Compilation of the departmental response to the consultation that closed on 24 July.
- Measures to address pollution caused by non-agricultural sources by different sectors.
- Removal of the requirements within the existing NAP regulations, although consideration will be given to amendments to existing NAP regulations that would strengthen environmental protection/improve water quality (however the report should recognise significant action from other sources is also key to delivering water quality improvement); and
- Policy areas outside the remit of DAERA (including planning policy, which is

within the remit of DFI). Noting that while the development of planning policy lies outside the scope of the Group, it is within scope to identify and comment on aspects of existing policy that may present barriers to the implementation of NAP proposals.

5. External Facilitator

An external facilitator will be appointed by DAERA to chair the group.

6. Membership

Membership of the Group is by invitation of the Minister only. A suitable nominated Deputy will be permitted to attend when the Member is unable to attend but should be capable of fully representing the Member in the meeting.

The Group will keep membership under review, and the Facilitator will propose any additional members to the Minister as appropriate and in line with business needs.

DAERA and AFBI officials should not be official members of the Group, but will attend in a supporting role, and will be limited to one person in FFRAG and CSAO and three people from EMFG, with others attending to present items and make notes.

7. Consensus of the Group

It is preferred that the Group agrees the proposals to be included in the report to the Minister. Where a consensus cannot be reached within the Group, the report which is presented to the Minister must identify those proposals that have been agreed by the Group but can also include other proposals which have not been agreed, provided that in respect of such proposals, the potential options considered by the Group are identified, with related advice provided on each such option.

The Group will agree a set of actions based on consensus and present these for an economic impact assessment. On consideration of the economic impact assessment, a further review will take place before finalising the report which will be presented to the Minister. Should the Minister or DAERA propose to supplement the Group's report or introduce additional proposals, the Group shall be given the opportunity to review and comment on such additions in advance of public consultation. The Group's comments shall be given appropriate weight and any such additions shall be clearly identified as separate from the Group's proposals within the consultation document.

Following the consultation, the Group will have the opportunity to review the finalised draft NAP before it is presented to the Executive for approval.

8. Time frame

This Group's aim is to produce an interim report by Christmas 2025 and a final report by early 2026. The timing of the final report can be kept under review by the Minister, informed by the views of the facilitator.

9. Secretariat Role

Administrative support will be provided from within DAERA, to support and maintain the work of the Group.

10. Reporting

The Secretariat will circulate minutes of the meeting within 5 working days after every meeting which provides:

Summary of topics discussed.

Highlights, issues and actions; and

Decisions made.

These should be reviewed for accuracy at the start of the following meeting, agreed by the Group and signed by the Facilitator.

The final report presented to the Minister will be made publicly available.

11. Meetings

The Facilitator will call meetings of the Group at a frequency that is appropriate to business needs. Meetings will be in person at a venue and date agreed in advance of each meeting.

The agenda for each meeting will be discussed between the Facilitator and members of the Group and finalised by the Facilitator in advance of each meeting. Agenda and papers will be issued at least 5 working days prior to each meeting.

12. Conflict of interest

Members should declare at the beginning of each meeting any conflict of interest.

13. Communication

Any publicity or public communications about the work of the Group shall be managed by the Group and be by agreement of the Group, with communications agreed at the end of each meeting. It is also recognised that the DAERA Minister may need to refer to the Group in addressing questions from MLAs and answering correspondence.

The Group will provide a respectful forum for open and frank discussion and communication. Therefore, it is essential that the stakeholder organisations that are

part of this Group fully respect the confidentiality of the discussions and the sensitivity of the topics and papers that may be considered. Stakeholders may consult a wider Group of their members on a confidential basis.

Membership of the DAERA Nutrients Action Programme Task and Finish Stakeholder Group (NAPSTFG)

Dairy Council (NI)

DCNI

Nature Friendly Farming Network

NFFN

NI Agricultural Producers Association

NIAPA

NI Environment Link (4 members)

NIEL

NI Food and Drink Association

NIFDA

NI Grain Trade Association

NIGTA

NI Meat Exporters Association

NIMEA

NI Pork and Bacon Forum

NIPBF

NI Poultry Industry Federation

NIPIF

Ulster Farmers' Union (4 members)

UFU

DAERA officials:

Food and Farming Rural Affairs Group (1 member)

FFRAG

Environment Marine and Fisheries Group (3 members)

EMFG

Chief Scientific Adviser's Office (1 member)

CSAO

Annex B. Meetings and Programme of Work

The Group commenced its work on 22 October 2025 and undertook an intensive programme of meetings and supporting workstreams between October 2025 and June 2026.

Meeting	Date	Location
Meeting 1	22 October 2025	CAFRE Greenmount
Meeting 2	27 November 2025	AFBI Hillsborough
Meeting 3	16 December 2025	AFBI Hillsborough
Meeting 4	15 January 2026	AFBI Hillsborough
Meeting 5	29 January 2026	CAFRE Greenmount
Meeting 6	05 February 2026	AFBI Hillsborough
Meeting 7	16 February 2026	AFBI Hillsborough
Meeting 8	02 March 2026	AFBI Hillsborough
Meeting 9	10 March 2026	AFBI Hillsborough
Meeting 10	19 March 2026	CAFRE Greenmount
Meeting 11	30 March 2026	AFBI Hillsborough
Meeting 12	19 May 2026	AFBI Hillsborough
Meeting 13	09 June 2026	AFBI Hillsborough

In addition to formal meetings, substantial work took place between meetings through Science Sub-Group meetings, Technical Working Group activity, bilateral engagement, drafting exercises, evidence gathering and review.

Science Subgroup meetings

10/12/2025	06/01/2026	09/01/2026
16/01/2026	23/01/2026	28/01/2026
30/01/2026	04/02/2026	10/02/2026 (AM)
10/02/2026 (PM)	18/02/2026	19/02/2026
20/02/2026	24/02/2026	05/03/2026
26/03/2026	02/04/2026	23/04/2026

Technical Working Group meetings

28/01/2026	11/02/2026	02/03/2026
10/03/2026	22/03/2026	26/03/2026
22/04/2026	05/05/2026	11/05/2026
02/06/2026	08/06/2026	

Economic Impact Assessment Subgroup activity

05/03/2026	26/03/2026	23/04/2026
28/05/2026		

A separate Communications Group was also established in April to support implementation planning and stakeholder communications. Meetings of this group were held on 16 April 2026, 28 April 2026, 01 May 2026, 07 May 2026, 18 May 2026, 19 May 2026, 20 May 2026 and 21 May 2026, with further work continuing as required.

The continuation of meetings into June 2026 reflected both the complexity of the issues under consideration and the Group's commitment to refining proposals through iterative discussion, technical examination and cross-sector engagement.

Annex C. Summary of Proposed measures

2019 Regulations	Proposed measures
Under the 2019 Nutrients Action Programme (NAP) rules, all farms must already have soil analysis and a fertilisation plan to justify the use of chemical phosphorus fertiliser. However, chemical phosphorus fertiliser continues to be widely available and is often used routinely, even where it is not needed. **Reg 13 - Measures governing the limits on the land application of chemical phosphorus fertiliser**	**4.1.1 – Limit chemical phosphorus fertiliser use on grassland through an additional advisory approach (APC1)** It is proposed to introduce a new additional approach to managing the use of chemical phosphorus (P) fertiliser on grassland. This approach builds on the existing NAP requirement and combines limits on the availability of phosphorus fertiliser products with strengthened advice and support. The aim is to ensure that phosphorus fertiliser is only used where there is a clear need based on soil nutrient levels and crop requirements. The proposed approach introduces a set of linked measures to manage how chemical fertiliser containing phosphorus is supplied and used on grassland. The existing NAP requirements for the use of chemical fertiliser containing phosphorus on arable land remain unchanged. Limiting chemical phosphorus fertiliser use on grassland The use of chemical phosphorus fertiliser will be linked to recent soil test results and based on crop requirement, as already in place through the 2019 NAP Regulations. In addition, the availability of chemical phosphorus fertiliser products with a lower phosphorus content will be limited to a small number of products: • Where there is no crop requirement for phosphorus only fertiliser products with no phosphorus content can be used. • Where there is a crop requirement for phosphorus, a limited number of low-phosphorus fertiliser products can be used if required. • Higher phosphorus fertilisers will still be available and can be used where there is a clear crop requirement. • Chemical phosphorus fertilisers can only be applied where the crop need cannot reasonably be met through the use of organic manures. The updated NAP Regulations will specify which chemical phosphorus fertiliser products can be used on grassland. These will be a limited number of low Phosphorus fertiliser products (P content 4% or lower) and higher Phosphorus fertiliser products (P content 15% or higher).

	Soil testing and nutrient management planning As is currently the requirement, farmers will be required to: • Have a valid soil analysis obtained within the last 4 years; and • Prepare a Nutrient Management Plan showing the need for phosphorus This will ensure that fertiliser is applied only where it is required. Controls at the point of sale Fertiliser merchants will play an important role in implementing the measures. At the point of sale: • Farmers will be asked to confirm that they have a soil test and a Nutrient Management Plan; and • Chemical fertiliser products containing phosphorus will include clear labelling such as - "Apply phosphate only as needed to meet crop requirements in accordance with the NAP Regulations. Excess phosphate may be lost to waterways and could cause damage to aquatic environments." Training and industry responsibilities Fertiliser merchants will be required to complete basic training on nutrient management and water quality. Furthermore, detailed technical training will be introduced over time for those selling chemical phosphorus fertiliser products, who wish to enhance their knowledge and expertise. This training will be based on recognised industry standards. Manufacturers, suppliers and merchants will be expected to take shared responsibility for supporting improved phosphorus management at both industry and farm level. The uptake of the more detailed technical training will be an indicator of industry support that will be reviewed. Responsible Phosphorus Management campaign An information campaign will be developed to support the proposed changes and encourage more responsible use of phosphorus. This will include: • Guidance materials for farmers • Information available through fertiliser merchants • Support from farming organisations, agri-food businesses and environmental groups Review of the measure

	This measure is of critical importance to reducing the overall phosphorus surplus and its effectiveness will be reviewed after two years, and again as part of the wider NAP review, as set out in the governance section. This will assess whether the approach is reducing the use of chemical phosphorus fertiliser and contributing to improved water quality. If the review concludes that the approach is not effective, then a more restrictive regulatory system will be required.
Under the existing regulatory requirements, only those farms operating under a derogation are required to operate within a Phosphorus balance of not more than 10 kg of phosphorus per hectare per year. ***Sch 8 Para 8***	**4.1.2 – Reducing Northern Ireland's average phosphorus surplus (APC2)** It is proposed to reduce the national average phosphorus surplus by 30%, from the 2024 level of 8729 tonnes over the 4 year duration of the next NAP. This 30% reduction was carefully evaluated and collectively agreed upon as a realistic target that aligns with national objectives whilst being feasible for farms that need to implement change. It is recognised that delivering the 30% reduction target is dependent on the further development of manure processing facilities/end of pipe solutions to process and manage nutrients off farm and export them from the NI agricultural system. This reduction would be achieved through a combination of measures, including: All farms with livestock manure nitrogen (N) production levels at or above 170 kg N/ha per year must comply with proposals relevant to their sector, and must do one of the following; • Ruminant livestock farms above the 170 kg N/ha threshold may join the Nutrient Stewardship Programme (NSP) and maintain a limit of no more than 10 kg P per hectare per year (Tier 1), or if that is not possible, reduce it by at least 10% over four years or demonstrate sustainable P management under the Soil P Protocol .(Tier 2) (see proposal 4.3.1 Nutrient Stewardship Programme). • Stay out of NSP and reduce both their N loading below 170 and their P balance by 15% • Stay out of NSP and reduce their N loading below 170 kg N/ha and work under the Soil P Protocol. • Under the Soil P Protocol farms must demonstrate that weighted average soil phosphorus levels are stable or decreasing by the end of the 4 year period. Reductions in P balance can be achieved by a range of actions, depending on individual farm circumstances. Key actions may include:

	• Improvements in animal feed phosphorus efficiency • Increased use of slurry and manure processing technologies to better manage and redistribute phosphorus • Limit or eliminate chemical phosphorus fertiliser use • Exporting slurry • Farming additional land The Soil P Protocol is for instances where a farm cannot demonstrate compliance with the applicable P Balance requirement, but, in specific circumstances, may be considered as a complementary means of demonstrating effective soil P management. Protocols for pig and poultry farms to demonstrate sustainable management of P as a complementary means to a farmgate P Balance have also been developed. Pig and Poultry farms which operate under IPPC licence will not be subject to the P Balance requirements as they already are required to demonstrate sustainable management of manure through Nutrient Management Plans. This approach focuses on overall national reduction, rather than relying on a single measure, recognising that different farms will contribute in different ways. It is important to note that improvements in water quality will not be immediate. Because phosphorus stored in soils is released slowly, meaningful changes are likely to occur over many years. However, this measure sets a clear and achievable direction of travel towards improved environmental outcomes. Progress of this measure will be reviewed after two years and again as part of the wider NAP review, as outlined in the governance section. If progress towards the 30% reduction is not on track, further measures will be required.
The NAP Regulations currently use just one excretion value for dairy cows. This was originally set in 2006 based on an annual milk yield of 6,206 litres per cow. It was reviewed and revised in 2019 to reflect the increase in the	**4.1.3 Dairy cow nutrient excretion values – based on milk yield (SVNP1 and SVNP2)** It is proposed to reform the standard nutrient excretion values for dairy cows under the NAP, by replacing the single values for Nitrogen and Phosphorus by values determined by milk yield. The aim is to make these values more accurate and fairer by better reflecting actual excretion rates, milk yield and dietary management, while avoiding disproportionate impacts on farms close to regulatory thresholds.

average annual milk yield to c. 7,600 litres per cow.

This will also be replicated for Phosphorus (P) excretion values for dairy cows, and those values are also set out in Table 1. Values will be determined using a DAERA online system and calculators, with farmers entering the relevant milk yield or dietary data for their herd.

There will be four different ways to determine the nutrient excretion values for a herd. Farmers should select one of these options:

- Milk yield banding: This involves applying the standard nitrogen values specified for each milk yield band, with supporting records of farm milk yield.

The proposed banding and excretion values for dairy cows are:

Table 1

Nitrogen (N) and Phosphorus (P) excretion figures for dairy cows

Milk yield bands (litres)	N excretion per cow (kg/year)	P excretion per cow (kg/year)
< 5,000	77	11
5,000 – 7,000	90	13
7,001 – 8,000	103	15
8,001 – 9,000	112	17
9,001 – 10,000	121	18
10,001 – 12,000	135	20
>12,000	149	22

- Farm-specific calculation (milk yield based): Farms may use their own milk yield data to calculate a tailored nitrogen value, rather than the standard values provided for in the fixed band average.
- Farm-specific calculations (diet based): Farms may choose this option where they are using specific feeding practices (such as lower protein diets). Nitrogen excretion can be calculated by using diet information. This option must be supported by independent verification. It is only relevant for herds with higher milk yields and concentrate feed inputs. Improving N efficiency in diets will reduce N excretion rates.

	• Default value: Farms who do not submit any data, the higher default excretion values will apply. Data relating to milk yield should be taken from either the most recent year's average or a rolling average of the most recent three-years. This data is to be submitted to DAERA annually via an online system.
The existing standard values for nutrient excretion figures for poultry are set out below **(Table 1c of Schedule 2 Regulation 9 – Nitrogen (N) and phosphorus (P) excretion rates for poultry to the 2019 NAP Regulations).**	**4.1.4 Updated poultry nutrient excretion figures (SVPN3)** It is proposed that the standard values for poultry figures are amended as outlined in Tables 2 & 3 below. As part of this review, the following amendments are recommended to the existing poultry production systems. These amendments will also improve the ease of use and read-across between regulations, guidance documents and online calculators. Changes are also proposed to the lay-out of the table in the regulations. The amendments to the standard values for poultry figures are outlined in the following tables: **Table 2** **Nitrogen (N) and Phosphorus (P) excretion rates for poultry (Table 1c of Schedule 2 of the 2019 NAP Regulations)**

Livestock type	Dry matter (%)*	Nitrogen (N) produced per 1,000 birds per crop (kg/N)	Phosphorus (P) produced per 1,000 birds per crop (kg/P)	Crop length (weeks)	Litter output per 1,000 birds per crop (t)	Litter output per 1,000 birds per week (t)
Broilers – indirect heating systems	72	30.3	5.0*	6	1.0	0.170
Free range broilers (0d – finish)	57	44.9	11.4	8	1.7	0.213

Free range broilers (0 – 28d)	65	18.6	4.4	4	0.53	0.133
Free range broilers (28d – finish	56	44.9	11.4	4	1.6	0.395
Turkeys 0 – 6 weeks	62	103.9	30.3	6	3.9	0.650
Turkeys 6 weeks – kill	59	305	73.8	8	12.3	1.538
Turkeys 0 – kill	61	408.9	104.4	14	16.2	1.157
Fattening Ducks	25	139	65	5	21.4	3.567

Livestock type	Dry matter (%)*	Nitrogen (N) produced per 1,000 birds per week (kg/N)	Phosphorus (P) produced per 1,000 birds per week (kg/P)	Crop length (weeks)	Litter output per 1,000 birds per crop (t)	Litter output per 1,000 birds per week (t)
Broiler breeders 0 – 18 weeks	55	2.9	2.0	18.	3.0	0.167
Broiler breeders 18 – 60 weeks	60	7.2	3.9	42	14.7	0.350
Broiler breeders 0 – 60 weeks	58	5.9	3.3	60	17.7	0.295
Pullets	72	4.7	1.7	16	2.3	0.144

Free range laying hens – single tier	46	5.8	2.2	60	17.3	0.288
Free range laying hens – multi tier	32	6.6	2.1	60	25.3	0.422
Housed hens	31	7.4	2.3	60	29.0	0.483

**Dry matter may vary depending on litter/manure drying systems. Adjust litter/manure output and nutrient profile accordingly. As DM increases, total weight of litter manure will decrease, and nutrient content / kg will increase.*

Table 3

Total Nitrogen (N) and Phosphorus (P) content of fertilisers and proportion of total phosphorus to total nitrogen (Table 2 of Schedule 2 to the 2019 NAP Regulations, in so far as is relevant to poultry only)

Solid manure type	Dry matter content (%)*	Total nitrogen content by weight (kg N/t)	Total phosphorus content by weight (kg P/t)	Proportion of total phosphorus to total nitrogen
Poultry manures				
Broiler – indirect heating systems	72	30.3	5.0	0.16
Free range broilers 0d-finish	57	26.4	6.7	0.25
Free range broilers 0-28d	65	34.5	8.2	0.24

Free range broilers 28d-finish	56	28.5	7.0	0.25
Broiler breeders 0 – 18 weeks	55	17.5	11.8	0.67
Broiler breeders 18 – 60 weeks	60	20.7	11.0	0.53
Broiler breeders 0 – 60 weeks	58	19.1	11.4	0.60
Turkeys 0 – 6 weeks	62	26.6	7.7	0.29
Turkeys 6 – kill	59	24.8	6.0	0.24
Turkeys 0 – kill	61	25.7	6.9	0.27
Pullets	72	32.7	12.0	0.37
Free range laying hens – single tier	46	18.8	7.5	0.40
Free range laying hens – multi tier	32	15.6	5.0	0.32
Housed hens	31	15.4	4.7	0.31

**Dry matter may vary depending on litter/manure drying systems. Adjust litter/manure output and nutrient profile accordingly. As DM increases, total weight of litter manure will decrease, and nutrient content/kg will increase*

There are currently three standard values under the current NAP Regulations for separated cattle slurries liquid portion and one value for the solid portion

(Table 2 of Schedule 2 - Regulations 3, 9 and 13 – Total nitrogen (N) and phosphorus (P) contents of fertilisers and proportion of total

4.1.5 Standard values for separated manures and slurries (SVPN4)

It is proposed to update the regulations to include a standard value for screw press separated slurry fractions as set out in Table 4 & 5.

AFBI have provided the following data on separated liquid and solids respectively. The Department proposes to include in the Regulations the mean as a standard value for screw press separated slurry fractions.

Table 4

phosphorus to total nitrogen (all on a fresh weight basis))

Separated liquid from screw press separation of cattle slurry

Separated liquid source	Dry matter content	Total Nitrogen (N) (kg N/m^3)	Total phosphorus (P) (kg P/m^3)	P:N ratio	Source
Separated liquid from 8% DM dairy slurry	6	3.5	0.6	0.17	AFBI data
Separated liquid from 7.8% DM dairy slurry	5.2	3.8	0.6	0.16	Fournel et al. 2019
Separated liquid from 6.3% DM dairy slurry	5	3.5	0.58	0.17	Fournel et al. 2019
Separated liquid from 8.6% DM cattle slurry	4.3	3.75	0.34	0.09	Fangueiro et al. 2008
Mean values	**5.1**	**3.64**	**0.53**	**0.15**	**Calculation**

Table 5

Separated solids from screw press separation of cattle slurry

Separated solid source	Dry matter content	Total Nitrogen (N) (kg N/m^3)	Total phosphorus (P) (kg P/m^3)	P:N ratio	Source
Separated solid from 8% DM dairy slurry	23.7	4.8	1.21	0.25	AFBI data
Separated solid from 7.8% DM dairy slurry	24.3	4.85	1.27	0.26	Fournel et al. 2019

Separated solid from 6.3% DM dairy slurry	26.2	4.81	1.36	0.28	Fournel et al. 2019
Mean values	**24.7**	**4.82**	**1.28**	**0.27**	**Calculation**

The Department intends to retain the values for strainer box and weeping wall standard values as these may still be in use on some farms.
Due to the variety of feedstocks for Anaerobic Digestate (AD) and consequent variability of digestate, no standard values are proposed. A specific nutrient content analysis should be used and provided as required by the existing regulations.

Under the current Nutrients Action Programme (NAP) regulations, application of nitrogen fertiliser to grassland each year is limited to 272kg N for Dairy Cattle and 222kg N for Other Livestock per hectare of agricultural area.
The Dairy cattle limit applies where more than 50% of the livestock manure applied both by land application and by the animals themselves, arises from dairy cattle. In all other cases the figures for other livestock applies.

(Regulation 10 Measures governing the limits on land application of nitrogen fertiliser to grassland

& Schedule 2 table 4 Regulation 10 – Nitrogen application standards for grassland crops)

4.1.6 Updated chemical nitrogen fertiliser limits for grassland (NF2)

It is proposed to introduce whole farm limits on chemical nitrogen fertiliser use, based on how much grass a farm produces – See table 6

Table 6 Whole farm limits on chemical nitrogen fertiliser use, based on how much grass a farm produce

Nitrogen application limits for Grassland Crops Grass Production Level	Balance of grassland nitrogen requirement (from chemical fertiliser or organic nitrogen supply other than livestock manure) Whole farm limits – kg/N/ha/year
Maximum: Target yield 12-15 (t DM/ha)	243 - 272
Moderate to High: Target yield 10-12 (t DM/ha)	223 - 242
Low to Moderate: Target yield 5-10 (t DM/ha)	0 - 222

The Department has reviewed the existing values in the regulations for effective nutrient management to ensure the correct amount of nitrogen is applied at the correct time.

	The revised values seek to introduce whole-farm limits on chemical nitrogen fertiliser use, based on how much grass a farm produces. The table in the existing regulations will be replaced with the values above, based on grassland production. Values are based on the latest available data, including local research and the UK Fertiliser standards (RB209, 2026)[1]. • Each production level would have a maximum allowable amount of nitrogen from chemical fertiliser (and from organic nitrogen sources other than livestock manure), expressed as kilograms of nitrogen per hectare per year. • Higher fertiliser limits would only be available to farms that can demonstrate higher grass production. These proposed limits are intended to better match nitrogen use with what crops can realistically use and need. High yields of grass forage Many farms in NI are generally able to produce multiple crops of grass forage. With efficient grassland management, precision nutrient application and optimal soil pH, very high yields can be produced if sufficient nitrogen fertiliser is applied. Increased forage production reduces the need for concentrate feeds that contribute to phosphorus surplus both at individual farm and national level. Nitrogen Requirements To support higher levels of forage production and use, these farms typically need sufficient nitrogen inputs. Comprehensive local growth trials have demonstrated the proposed limits in Table 6 will enable grass production to the agronomic optimum. Additional Requirement for High-Production Farms Farms in the maximum grass production category will have an additional requirement to support the higher nitrogen allowances. These farms would be required to: • Carry out soil sampling and analysis at least every four years; • Sample each homogeneous grassland area (areas with similar soil type and management); • Test, as a minimum, for: o Phosphorus (P), o Potassium (K), and

	○ Soil pH. This soil testing must follow the procedures already set out in Schedule 5 of the 2019 NAP Regulations.
There is no specific allowance or limit for processed organic manures within the existing 2019 NAP Regulations.	**4.1.7 Allowance for processed organic fertilisers (NF3)** It is proposed to introduce a specific allowance and limit of 100 kg nitrogen per hectare per year for "Processed Organic Fertilisers" derived from agricultural sources Under this proposal: • These fertilisers would be classified separately from livestock manure; • They will count towards the limit for chemical fertiliser or organic nitrogen supply other than livestock manure; • The current total N Fertiliser application limit will not be increased, and must continue to be applied to crop need; • Processed is defined as chemical and/or heat treatment and excludes simple mechanical processing such as pelleting or composting; • Only processed organic fertilisers derived from agricultural sources would be allowed within the definition of "Processed Organic Fertilisers"
At present, the quantity of slurry that may be spread during the period of 30 September to 15 October, and during the month of February is restricted to $30m^3$ per hectare per single application. Regulation 8(9)(c) **Sch 4 Part 2 Table 3 Risk assessment for fertiliser application to land other than steeply sloping land** Note 2	**4.2.1 Reduced slurry application volumes in February and early October (WP3)** It is proposed that the maximum volume of slurry which can be applied during the month of February and the period of 30th September to 15th October is reduced from the current limit of $30m^3$ per hectare per single application to $25m^3$ per hectare per single application.
LESSE is currently defined in the 2019 Regulations as: equipment which is used to spread slurry by bandspreading, dribble bar, trailing	**4.2.2 Clearer definition of Low Emission Slurry Spreading Equipment (LESSE1)** It is proposed to update and clarify the definition of LESSE in the regulations. Under the proposed definition, LESSE will be expanded to include:

hose, trailing shoe, soil incorporation or soil injection methods.

(Regulation 3 Interpretation (2))

- Any method that reduces ammonia emissions by 30% or more compared with the inverted splash plate method.

What slurry spreading methods would be covered?
The best-known examples of LESSE currently include:

- Trailing hose (also known as dribble bar).
- Trailing shoe.
- Injection systems.

Under the proposed definition, these methods would continue to be recognised. In addition, new or alternative technologies may also qualify if they meet the emissions reduction criteria (of reducing ammonia emissions by 30% or more) and are supported by scientific evidence.
This approach avoids limiting LESSE to a fixed list of equipment types and instead focuses on environmental performance.

LESSE is currently mandatory for certain higher impact farming activities, including:

- Farms with more than 200 cattle livestock units (LU).
- All slurry spreading contractors.
- Anaerobic digestate.
- Large pig farms (producing 20,000 kg or more of manure nitrogen per year.)
- Derogated farms when spreading slurry from 15 June each year.

Other farms may choose to use LESSE voluntarily but are not currently required to do so.

4.2.3 Tiered move to increased use of LESSE (LESSE 2 and 3)

It is proposed to extend the mandatory use of LESSE to more farms over time, using a tiered approach based on farm size, measured in livestock units.

Under the proposal, LESSE would become mandatory as set out in Table 7.

Table 7: Proposed LESSE tiers to 2030

	Livestock Unit per farm	Proposed date of Mandatory LESSE
Tier 1	All farm businesses over 100 LU	by February 2028
Tier 2	All farm businesses over 75 LU	by February 2029
	All pig farms over 10,000kg livestock manure N production per year from pigs.	by February 2029
Tier 3	All farm businesses over 50 LU	by February 2030

This will mean a gradual increase in LESSE use across Northern Ireland, with the largest farms required to change first. The tiered approach is intended to balance environmental benefits with practical considerations for farmers.

Regulation 8 Requirements as to the manner of land application of fertiliser to any agricultural land para (11)	DAERA recognises that moving to LESSE is not without challenges. Cost, field access, ground conditions, equipment availability, and reliance on contractors all affect what is practical on different farms. Farming systems and land types vary across NI, and these proposed changes take this into account. It is intended that this measure will be introduced alongside financial support for LESSE under Sustainable Farming Investment Scheme. Where it is not practical to spread on a field using LESSE due to slope existing exemptions will apply as specified in the 2019 NAP Regulations. Subject to the outcome of this consultation this measure will be incorporated into the Ammonia Strategy.
Currently, all new or substantially modified slurry or silage stores are required to be notified to DAERA 28 days prior to use. **Part 4 regulation 19 (6) Manner of storage of slurry** **Regulation 24(6) Manner and Storage of Silage**	**4.2.4 Pre-Notification of new slurry and silage storage (SR2)** It is proposed to strengthen the regulatory requirement for pre-notification of slurry or silage stores prior to construction. Controllers must notify DAERA 28 days before construction (including substantial enlargement or substantial reconstruction) begins and provide the registration number of the Chartered Structural or Civil Engineer supervising and certifying the building works. If no acknowledgement is provided by DAERA within 28 days following notification, construction can proceed. This amendment aligns Northern Ireland with England and Wales, where notification is required 14 days before construction begins. However, we propose to retain the 28 days pre-notification period. If no acknowledgement is provided by DAERA within 28 days following notification, construction can proceed. Construction, substantial enlargement or substantial reconstruction of slurry or silage storage systems must be pre-notified 28 days prior to construction work beginning. Where such a system must comply with British Standard 5502, this must be signed off by a Chartered Structural or Civil Engineer. Welsh and Scottish guidance require certification by an Engineer, so this amendment enhances regulatory assurance as set out in current regulations. Controllers will no longer be required to notify DAERA prior to use.
There is already a requirement for new above-ground slurry stores to be covered. However, the type of cover intended by this requirement has not always been consistently understood.	**4.2.5 Clarify cover requirement for new above-ground slurry stores (SR3)** It is proposed to clarify through guidance and awareness raising that for new above ground slurry storage facilities, the cover must be: • A tensioned fitted cover (for example, a properly fitted membrane designed to remain in place), or

Sch 6 Para 12	• A fixed structure (such as a roof or lid). Other cover types that are loose-fitting or not fixed in place are not considered to meet the existing requirement.
The existing regulatory requirements are not prescriptive to urea, the requirements are general to nitrogen fertilisers, relating to both organic and chemical fertilisers. **Regulation 7 Prohibited application of fertiliser**	**4.2.6 Limit the use of unprotected granular urea fertilisers (NF1)** It is proposed that the use of urea fertiliser in Northern Ireland would be managed through a seasonal approach, with a requirement to only use protected urea for applications from 01 April each year. Protected urea: urea fertiliser treated with a urease inhibitor (or equivalent treatment) to reduce ammonia emissions following application. Unprotected urea: urea fertiliser without such treatment. Across Great Britain (GB), an industry-led stewardship approach has been introduced to reduce ammonia emissions from urea fertilisers. This approach is delivered through farm assurance standards and advisory support, and combines: • Seasonal restrictions on the use of untreated (unprotected) urea; and • A requirement to use protected (inhibited) urea during the main growing season. It is proposed that Northern Ireland adopt a similar approach to the GB stewardship model. Restricted use of unprotected granular urea Under this proposal, unprotected (uninhibited) granular urea fertiliser will only be applied during a limited application window: • 1 February to 31 March (inclusive) Outside of this period, the use of unprotected granular urea is prohibited. Requirement to use protected granular urea For the remainder of the year: • 1 April to 15 September, all granular urea-containing fertilisers would be required to be: • Protected (i.e. treated with an inhibitor); and • Applied in accordance with good nutrient management practice. Record-keeping and compliance Farmers would be required to maintain records to demonstrate compliance, including: • The type of granular Urea fertiliser used (protected or unprotected);

	• Date of application; • Application rates and fields where applied The effectiveness of this measure, including assessment of compliance, will be reviewed after two years and again as part of the wider NAP review, as set out in the governance section, and if necessary further action will be considered. Subject to the outcome of this consultation this measure will be incorporated into the Ammonia Strategy.
The current NAP rules include controls on the land spreading, storage and records relating to digestate. **Regulation 12 Measures governing the application of anaerobic digestate**	**4.2.7 Anaerobic Digestate Measures (AD1, AD2, AD3, AD4 and AD5)** It is proposed that the NAP rules are updated as follows: Separation of Digestate to reduce Phosphorus content • Where the separated liquid portion of digestate has a low phosphorus to nitrogen ratio (1:10 or lower), it can be spread under the existing rules for cattle slurry. • If the digestate is produced using feedstock sourced from outside Northern Ireland, it must be applied strictly in line with crop nutrient needs and will require nutrient management plan completed and retained on farm. Targeted application of Digestate to Land • Where the separated liquid portion has a higher phosphorus to nitrogen ratio than 1:10, then it must be applied strictly in line with crop nutrient needs and a nutrient management plan must be completed and retained on farm, as required by the 2019 NAP Regulations. Record keeping and reporting of nutrient movements • The movements of AD must be recorded in the same way that slurry and manure imports and exports are recorded. This includes recording slurry and separated slurry from farms to AD plants, as well as processed digestate returning to farms. All movements must be notified to DAERA to allow oversight just as with manure imports and exports. Further details available in section 4.4.1 and 4.4.2. These updates will support better reporting of processing of slurry and manure through AD, removal of excess phosphorus, and sustainable management of digestate.
At present, on application, eligible farms can operate under a Derogation from the standard nutrient limits set out in the Nutrients Action Programme	**4.3.1 Nutrient Stewardship Programme - a revised approach to Derogation (DER 1 to 5)** To replace the current Derogation with a revised approach called the Nutrient Stewardship Programme (NSP). While many of the existing environmental safeguards would remain, several important changes are proposed and set out below.

(NAP). This allows eligible grass-based livestock farms to apply a higher amount of nitrogen from grazing livestock manure (up to 250 kg nitrogen per hectare per year), provided they meet a strict set of conditions. Key current requirements include: • At least 80% of the land receiving manure must be grassland. • The farm must keep grazing livestock (such as cattle or sheep). • The farm must prepare and submit annual nutrient plans and accounts. • Limits on phosphorus (P) surplus, soil testing requirements, and specific rules on slurry spreading and cultivation timing. • Restrictions on the use of clover and other leguminous crops. • Farms must apply every year to remain in Derogation. These requirements are intended to protect water quality while supporting productive grass-based farming. **Part 10 - Derogation from measures governing the limits on land application of livestock manure**	a) Change of Name • The term “Derogation” would be replaced by “Nutrient Stewardship Programme”. • This is intended to better reflect the higher standards of nutrient management required and the environmental benefits delivered, as more farms are utilising nutrients more efficiently. b) Two-Tier Structure • Tier 1: Farms that already meet all requirements of the (current and new) would enter Tier 1, recognising their high level of nutrient management. • Tier 2: Farms that do not yet fully meet all Tier 1 Phosphorus Balance requirements could enter Tier 2 and work towards Tier 1 over time, with advisory support. c) Grassland Requirement • The minimum grassland requirement would be reduced from 80% to 70%. • This would allow some farms to grow more arable crops, such as cereals. • Additional safeguards (such as buffer strips near watercourses) on some arable fields would be required to manage any risks to water quality. d) Phosphorus Balance Rules • Existing participants will enter Tier 1 and maintain the current limit of no more than 10 kg P per hectare per year surplus. • New Tier 2 entrants will be permitted to join with a higher P surplus, provided they commit to reducing it by at least 10% over four years, or to 10 kg P per hectare per year. • Compliance with the Phosphorus balance, will be assessed using a three-year rolling average, allowing for normal year-to-year variation in farming conditions. • Compliance may also be demonstrated through soil testing showing stable or declining soil phosphorus under the Soil P Protocol. • All farms must prepare and submit annual nutrient/fertilisation accounts, as per the existing requirements which will be checked and verified by NIEA. e) Clover and Leguminous Crops Current limits on clover and leguminous crops are designed to reduce risk of elevated nitrate levels in groundwaters. This is a measure historically applied by the EU due to widespread issues in some

	European countries. However, as most soils in Northern Ireland are less vulnerable to nutrient losses than those in European countries, the following changes are proposed: • To permit more clover and legumes which has the potential to reduce the need for chemical fertiliser and imported feed. • Targeted safeguards will be introduced in higher-risk areas if necessary. f) Application to the Programme • Tier 1 farms will apply for a maximum four years, aligning with the NAP cycle, rather than applying annually. This means that those applying for entry into the scheme part way through the NAP four year review cycle will only be approved up to the end of that review period. • Tier 2 farms will be required to apply for entry into the programme each year, to allow progress to be reviewed and monitored. • Annual nutrient planning and reporting will be required for all participants, which will be checked and verified by NIEA. g) Inspections, Training and Review • Tier 1 farms, will be considered as a lower risk and will therefore have a 1% inspection rate, reflecting their higher compliance. • Tier 2 farms will receive targeted training and advisory support on nutrient management. • Farms in Tier 2 (considered as in-conversion) will be considered as a higher risk than those in tier 1 and therefore will have a 5% rate of inspection. • Nutrient management accounts will continue for farms operating under the programme and will continue to be subject to monitoring and review by NIEA annually. • Farms which are not part of the Nutrient Stewardship Programme but which are operating over 170kg Nitrogen per hectare per year, will be considered High Risk and will be subject to the highest 10% rate of inspection. The proposed Nutrient Stewardship Programme will bring a greater proportion of farm businesses within a structured and monitored regulatory framework than the current derogation model. By widening participation, more farms will be subject to defined nutrient management requirements, more detailed record keeping, and increased oversight. Ensuring enhanced nutrient management across a larger cohort contributes to the protection and recovery of sensitive habitats in line with DAERA's obligations under the Habitats Regulations.

	The level of uptake and impact of the NSP will be reviewed after two years, and again as part of the wider NAP review, as set out in the governance section. If the review concludes that the approach is not effective, then a more restrictive regulatory system will be required.
The NAP Regulations currently provide requirements for post-harvest measures, but do not have any requirements for action at planting stage. **Part 4 - Regulation 25**	**4.3.2 Mitigation Measures for late harvested arable crops** To introduce specific provision on implementation of mitigation measures at planting stage supported by additional guidance. Mitigation will be required on fields planted with late harvested crops, where there is a risk to a watercourse e.g. slope of the field, run-off pathways and proximity to a watercourse. Such mitigation will be laid out in guidance. Examples of actions to be considered at crop establishment include: • Ploughing an upturned outside furrow parallel with the waterway • Inclusion of an appropriate grass filtration buffer between the crop and the watercourse
The Nutrients Action Programme sets rules that apply to all farms in Northern Ireland to help protect water quality from nutrient pollution, such as nitrogen and phosphorus. While these rules apply everywhere, evidence shows that water quality pressures are not the same in all areas. In some catchments, water quality continues to decline despite existing measures.	**4.3.3 A focused approach to improving water quality (FA1)** To introduce a “focused approach” to support the NAP. In focused areas, it is proposed to provide additional advisory support, education and recommendations for voluntary measures to mitigate against the risk of nutrient losses to water. In doing so it will provide additional targeted support in specific high-risk catchments, alongside the existing NAP rules that continue to apply to all farms. The focused approach is intended to ensure that: • The right measures are used in the right places, and • Action is concentrated where the risk to water quality is greatest. How focused areas would be identified Focused areas will be selected using existing monitoring and assessment data, including: • Water quality trends in rivers and lakes, • Information on protected sites and habitats, • Evidence of rising nutrient levels, • Assessments carried out under previous NAP implementation reports, and

	• Data on land and runoff risk. This process will identify catchments where agricultural nutrient losses pose the greatest risk to water quality. Upon being selected participants will be signposted to advisory support available to them. What support would be offered in focused areas The focused approach will rely on advice, education, and voluntary action, rather than additional regulatory controls. Support will include: • Advice and training on nutrient management and water protection; • Non-regulatory advisory farm visits; • Support to access funding or grants for practical measures such as buffer strips, tree and hedge planting, and yard improvements; • Advice on techniques to manage or export excess nutrients, such as slurry separation; • Coordination between advisers to ensure consistent messages. Advice will be delivered through organisations such as CAFRE, environmental advisors and existing catchment-based programmes. Working with farmers In focused areas, farmers will be invited to take part in themed peer learning groups. These groups will: • Meet at key times of the year, • Often be hosted on participating farms, • Discuss and demonstrate practical actions that improve water quality, • Allow farmers to learn from advisers and each other. • Receive one-to-one advice as part of this support. More general information, including water quality monitoring results, will be published on DAERA's website. Ongoing monitoring under the Water Framework Regulations and future NAP implementation reports will track progress over time. DAERA is proposing that uptake of the focused approach measure will be voluntary. This is an opportunity to show improvement through voluntary uptake and action as an alternative to implementation by Regulation.

	The level of uptake and impact of this measure. will be reviewed after two years, and again as part of the wider NAP review after 4 years, as set out in the governance section. If the review concludes that the approach is not effective, then a more restrictive regulatory system will be required.
Phosphorus use efficiency on NI farms is estimated at about 51%, which is average compared to some other intensive farming regions in Europe.	**4.3.4 Nutrient Efficiency Roadmap for NI farming** To develop a Nutrient Efficiency Roadmap for Northern Ireland farming, built around an overarching mission: *To enhance food security, farm profitability, and environmental outcomes by increasing nutrient security through the efficient use of nitrogen and phosphorus on NI farms.* Work on the Roadmap will begin ahead of NAP 5 coming into effect. Its development and implementation will run in parallel and it will be a key advisory support over the period of the next NAP. Key features of the proposal include: • A co-designed and co-owned roadmap, involving farmers, government, industry, environmental groups and other relevant organisations. • A focus on practical actions that can be adopted on farms now, alongside a pathway to increase uptake over time. • Use of task-and-finish groups to support delivery of specific actions. • Governance and coordination supported by DAERA, building on existing stakeholder structures. Scope of the Roadmap The roadmap will: • Prioritise nitrogen and phosphorus, while recognising the importance of other factors such as soil pH and nutrients like potassium and sulphur. • Focus mainly on-farm (“pre-farm gate”) actions but may include post-farm gate measures where these clearly improve nutrient efficiency. • Avoid actions that would have unjustified negative impacts on greenhouse gas emissions or carbon capture. • Place soil health at the centre of improved nutrient management. Without a coordinated roadmap, opportunities to improve efficiency, reduce pollution and support farm profitability may be missed.

Farms that export or import slurry and other organic manures are already required to keep records of these movements. These records include details of the quantity moved, when it was moved, the source destination and transporter. Information on exports for the previous calendar year is submitted to DAERA once a year, no later than the end of January of the following year. **Regulation 27 (1) (m)&(n)**	**4.4.1 Enhanced online system for recording slurry and manure exports and imports (IT1)** The existing online system will be enhanced to ensure more up to date and accurate reporting of exports and imports of slurry and manures. Organic manure movements must be notified to DAERA as follows. • All organic manure movements must be notified to DAERA by the exporter three times annually as a minimum. Movements up to the end of February, June, and October must be notified by the exporter and verified by the importer no later than the end of the subsequent month. • Additionally, all exports of 15 miles or greater in a straight-line distance must be notified to DAERA within five days of the transfer. Verification by the receiving farm or operator, is required within two weeks of the receiving farm or operator being notified. • This notification will be by the online system which will be enhanced. An App will also be developed so that farmers can notify and verify movements using a mobile phone, providing an alternative to logging into the online system directly. A phone line alternative to the online system and App will also be available., • The five day notification period for transfers of 15 miles or greater does not apply to transfers of separated slurry solids and poultry litter to licenced manure processing facilities. • The 15 mile straight line distance is measured from the location of the holding where the slurry is stored/produced, if this is different from the location of the registered Farm Business ID. • Under the 2019 NAP Regulations, Reg 27 (1) farmers are already required to … “keep sufficient records to allow the following information to be ascertained for any calendar year - …” Therefore, farmers should keep records of slurry movements on an ongoing basis, and these records should be available for inspection in the current year. These records could be a log kept in a notebook or documentation from a contractor or haulier. This will be highlighted in guidance for the updated NAP. Additional measures • Where farms found to have submitted false or misleading information, or where there is found to be insufficient evidence to verify transfer, farms will be required to notify the Department at least a day in advance of transfer and submit geotagged photographs as evidence of movements, on the day of transfer. These photographs must show departure from the exporting farm and spreading or unloading at the importing farm/destination. • Where, on assessment, the Department finds that an export has been declared to land which is unsuitable for spreading slurry or manure, such as bog or upland rough grazing, then the export will be invalid.

The current recording system mainly focuses on raw slurry and other organic manures moved between farms.	**4.4.2 Extending the system to processed slurry solids and digestate movements (IT2)** The existing online system will be extended to include additional materials, such as digestate and processed slurry products, to give a more complete picture of how nutrients are managed across the region. Therefore, exports and imports of processed slurry solids and digestates must be notified to the Department as follows: - • All processed slurry solids and digestate movements must be notified to the Department by the exporter three times annually as a minimum, Movements up to the end of February, June, and October must be notified by the exporter and verified by the importer by the end of the subsequent month • Additionally, all exports of 15 miles or greater in a straight-line distance must be notified to the Department within five days of the transfer. Verification by the receiving AD plant, manure processing facility or farm, is required within two weeks of the receiver being notified. • The five day notification period for transfers of 15 miles or greater does not apply to transfers of separated slurry solids and poultry litter to licenced manure processing facilities • The additional measures for slurry and manure listed at 4.4.1 also apply.
Currently, farms are required to have a minimum of 22 weeks slurry storage, unless they are a pig or poultry enterprise where they are required to have a minimum of 26 weeks **Regulation 17 (3)**	**4.5.1 Awareness of existing Storage requirements and how dirty water storage, rainwater and parlour washings can impact this (SR1)** To raise awareness of the existing storage requirements and share best practices for making the most of on-farm storage facilities This will be done through advisory support, guidance and training by the Department and other trusted advisors to raise awareness of regulatory requirements for storage requirements. This includes advice about how dirty water storage, rainwater and parlour washings can impact overall farm storage. Advice and information will be provided on how to make the most of existing storage facilities to ease pressures on storage needs, especially during extended periods of wet weather. Guidance will cover best practices for handling and reducing the impact of dirty water, rainwater and parlour washings.
Current regulations require silage bales to be stored at least 10 m from waterways and managed to prevent seepage.	**4.5.2 Revised silage bale storage requirements (WP2)** To strengthen the regulatory framework to ensure best practices are followed and to mitigate against the risk of pollution when silage bales are stored in fields.

Part 4, 24 - Making and storage of silage	It is proposed to include an amendment so that: • Silage bales should not be stored in areas where there is increased risk of run-off into the waterway; and • They should be stored in a manner to reduce the risk of effluent seepage and run-off to the waterway. How silage bales are wrapped for storage and that they should not be within 10 metres of a waterway will remain unchanged as a minimum requirement.
	4.6.1 Definition of Appropriate Person (FI1) The Department is proposing to amend the definition of appropriate person to align the wording so that it is consistent with the wording used for storage requirements already used within the Regulations. It is proposed that in paragraphs (c) and (d) of the definition that 'livestock manure' will be replaced with 'Organic Manure'. Thereby, reference to the appropriate person will be extended to include those who have control of all organic manures and not just livestock manure.
	4.6.2 Definition of Farmyard manure The definition of farmyard manure will be amended to include stackable organic matter that can be used as a fertiliser
	4.6.3 Updating terminology The NAP regulations currently refer to 'Fertilisation Account' and 'Fertilisation Plans'. It is proposed to amend these to 'Nutrient Management Account' and 'Nutrient Management Plans' which are more reflective of the terminology used across the industry.
	4.6.4 Covering of Lagoons Following the consultation in 2019, it was agreed that the provisions within Schedule 6, paragraph 12 reference to 'Any slurry storage tank' should not include lagoons. The 2019 NAP Regulations do not accurately reflect this, and it is proposed that this should be corrected as part of the regulatory review.
	4.6.5 Definition of heavy rain (IS1)

Currently the definition of heavy rain simply states, “more than 4mm of rain per hour”, this may be difficult for some to interpret. To improve clarity, it is proposed to include “when a Met Office weather warning for rain is in operation”.

This amendment makes clear to operators, especially when considering the restriction on applying fertiliser when heavy rain is falling or forecast within 48 hours. Heavy rain will now be defined as either more than 4mm of rain per hour or when a Met Office weather warning for rain is in operation.

4.6.6 Changes to the Phosphorus content of livestock feed

The analysis of the P content of ruminant concentrate feed has recently been completed and has confirmed reductions in P content.

The phosphorus (P) content of livestock diets is a key factor within the overall P inputs of NI and hence a key driver of the overall NI P balance. Over a number of years AFBI have undertaken an extensive programme of work, mainly funded by DAERA, which investigated nutritional strategies to reduce P levels in dairy, pig and poultry diets. This work demonstrated that P levels in diets could be lowered from historical levels, while maintaining productivity. This work was conducted in collaboration and discussed with the feed industry.

The analysis of the P content of ruminant concentrate feed has recently been completed and has confirmed reductions in P content. Based on the research the table in the NAP Regulations will be updated from four values to two, reflecting the most up to date data. Table 8 shows the changes will be as follows:

Table 8 Existing NAP 2019 Regulation and Proposed Change

Existing NAP 2019 Regulations		**Proposed change**	
Agricultural Product	Phosphorus Content (% fresh weight)	Agricultural Product	Phosphorus Content (% fresh weight)
Poultry Concentrate	0.5 (or actual declared content)	Ruminant Concentrates	0.47 (or actual declared content)
Pig Concentrate	0.48 (or actual declared content)		
Ruminant Concentrate	0.55 (or actual declared content)		

	<table><tr><td>All other concentrates</td><td>0.58 (or actual declared content)</td><td>All other concentrates</td><td>0.43 (or actual declared content)</td></tr></table> Labelling of Feed It is also proposed that all manufacturers of Animal feed clearly label the product to show the % P content.
Currently, the Controller is responsible for the management of their holding, including the provision of information to the Department as requested. This also includes a duty not to provide false or misleading information. **Part 6, 28 - Duty of the controller not to provide false or misleading information**	**4.7.1 False or misleading information provisions (FI1)** To extend the existing duty not to provide false or misleading information so that it applies not only to the controller, but also to the appropriate person. This will mean that individuals who undertake work or supply information on behalf of a controller could be held responsible if they deliberately provide false or misleading information for the purposes of the Regulations. This proposal builds on changes made during the last review of the Nutrients Action Programme (NAP), where certain offences relating to slurry spreading were extended to apply to the appropriate person. It recognises that contractors often carry out this work and may commit offences independently of the controller's direct knowledge or instruction.
Since 2007, compliance with NAP rules has been checked mainly through inspections linked to farm support schemes. Until recently, inspections were carried out under the EU cross-compliance system. From January 2026, this system has been replaced by a new set of Farm Sustainability Standards (FSS). To receive payments under schemes such as the Farm Sustainability Payment, farmers must meet these standards, including Farm Sustainability Standard 1, which	**4.7.2 Increased inspections in focused areas (ES1)** This proposal introduces a revised approach to inspections which aims to make them more targeted, efficient and fair, so that effort is focused on the farms and activities that present the greatest risk to the environment. The proposed approach is as follows; A stronger focus on advice and support The proposed approach recognises that most farmers want to comply with the NAP requirements and protect water quality. Under this proposal there will be a focus on: • clear guidance and information • raising awareness of requirements • access to advisory support

covers protection of water from pollution and reflects the existing NAP rules. A new penalty system applies from 2026. It is intended to be proportionate and fair, taking account of how serious any breach is. **Regulation 27 (5)**	Where issues are identified, the first step will normally be to work with the farmer to correct them. This will help farmers understand what is required and how to meet the standards. A more targeted approach to inspections Inspections will be more focused on farms and activities where the risk to the environment is higher. This means that: • farms that produce higher levels of livestock manure will be more likely to be inspected • inspection rates will vary depending on the level of risk and participation in support programmes For example: • Farms which are not part of the NSP, but which are operating over 170kg Nitrogen per hectare per year, will be considered High Risk and will be subject to the highest 10% rate of inspection. • Farms in Tier 1 of the NSP, will be considered as a lower risk and will therefore have a 1% inspection rate, reflecting their higher compliance • Farms in Tier 2 of the NSP (considered as in-conversion) will be considered as a higher risk than those in Tier 1 and therefore will have a 5% rate of inspection. This approach is designed to target resources where they can have the greatest impact. More visible inspection activity The proposal includes a greater presence of inspectors on the ground. Inspections will focus on key activities that can lead to pollution if not managed properly, such as: • Spreading slurry during unsuitable conditions (for example, before or during heavy rain) • Use of equipment designed to reduce emissions when spreading slurry • Checking records of manure being moved between farms This will help ensure that the most important rules are being followed in practice. Simpler and more focused inspections The current inspection system covers a wide range of checks. Under this proposal, inspections would be streamlined. This means inspections will focus on the most important areas, including: • Limits on nitrogen from livestock manure

	• Use of phosphorus fertiliser • Adequacy of slurry storage • Management of farmyards • Risks of pollution reaching waterways • Record keeping Simplifying inspections will make them quicker to carry out and allow more farms to be inspected overall.

Advice and Support

The Group recognises the importance of advice and support to farmers to ensure the successful implementation of the proposed measures above. In addition, advice should be provided to encourage the uptake of voluntary measures (which are not proposed to be mandated in the regulations but which will be included in the consultation document) such as voluntary, uncultivated buffer strips alongside waterways in arable fields and continuing to raise awareness of the benefits of liming on suitable land.

Governance and monitoring

A governance structure involving stakeholders that will provide an ongoing monitoring mechanism to carry out interim review and recommend adjustments during the period of the next NAP is being developed. This mechanism will allow the effectiveness of measures to be assessed and if required adjustments can be made to improve impact.

Interim review is a specific element of new measures on Chemical Phosphorus Fertilisers, Nutrient Stewardship Programme and Focused Approach. However, the ongoing monitoring mechanism will extend more widely over the NAP measures. This new monitoring mechanism will be in addition and complementary to the established NAP monitoring structures and requirements. The successful delivery of the updated Nutrients Action Programme (NAP) depends on wider policy, delivery and investment systems working effectively together.

The Group agreed that the proposed measures depend on demonstrable progress on wider ammonia policy. The Group was clear that such progress was needed, alongside the implementation of the NAP measures, recognising that the NAP's ambition can only be realised where ammonia policy advances in parallel. It was recognised that there are interdependencies between ammonia mitigation and the environmental assessments which are completed as part of the planning process. The Group recommended that the governance arrangements include a formal mechanism for assessing ammonia policy progress as part of considerations regarding implementation of the measures.